

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

IN RE:
Jimmie Lee Hobson
Dolores Manuel
DEBTORS.

CASE NO. 14-12414
CHAPTER 13

MOTION TO WAIVE INSURANCE

Comes now the Debtor(s), by and through her attorney for record, Robert B. Vandiver, Jr., pursuant to Bankruptcy Code Rules and Procedures, and moves the Court for an Order to waive insurance.

That physical damage insurance which could be provided in the plan through Priority Insurance Company under Master Policy No.: MFD#2-83-00 should be waived on the 1996 Cadillac Deville because:

- ☐ Lienholder, Jackson Title Loans agrees to waive this coverage.
- ☐ Proof of insurance has been furnished by debtor or lienholder.
- ☒ The automobile is inoperable and not presently in use
- ☐ Value of the automobile is less than \$500.00
- ☒ The debtor is unable to obtain insurance due the age of the vehicle.

Wherefore the Debtor(s) move(s) the Court for service of process on all appropriate parties, for a hearing convenient for the Court, and for a Court Order allowing the Debtor to waive the forced placed insurance on the 1996 Cadillac Deville because of the age of the vehicle.

Respectfully Submitted,

/s/Robert B. Vandiver, Jr.
Robert B. Vandiver, Jr. 15685
Attorney for Debtor
P.O.Box 906
Jackson, TN 38302-1313
731-554-1313

CERTIFICATE OF SERVICE

The undersigned party, Attorney for party, or agent therefore hereby certifies that on this the 16th day of September, 2014, copies of the documents identified below were served by mail to the parties listed:

A motion captioned motion to waive insurance filed by the debtor counsel on September 16, 2014.

/s/Robert B. Vandiver, Jr.
Robert B. Vandiver, Jr. 15685
P.O. Box 906
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731-554-1313

Debtor(s) attorney
Chapter 13 Trustee
Debtors
Jackson Title Loans, 749 Old Hickory Blvd, Jackson TN 38302